

EXHIBIT A

From: [Neiman, Peter](#)
To: [Weinstein, Marc A.](#); [Oxford, Neil](#); [Maguire, Bill](#); [Smith, Dustin](#); [McGoey, John](#); [Farrell, Gregory](#)
Cc: [michael.rosenshaft@katten.com](#); [Dulberg, Andrew S.](#); [Warren, Brittany R.](#); [smccarthy@kostelanetz.com](#); [Nicholas Bahnsen](#); [Daniel Davidson](#); [Goldberg, David L.](#); [Castano, Nelson S.](#); [La Bella, Sofia R](#)
Subject: RE: SKAT's allegations of plans as qualified plans under IRC 401(a)
Date: Monday, December 23, 2024 9:22:01 AM

Marc,

Thank you for advising of SKAT's position. Please let us know as soon as possible if you intend to make corresponding adjustments to SKAT's designated trial evidence.

Thanks,

Peter

From: Weinstein, Marc A. <marc.weinstein@hugheshubbard.com>
Sent: Sunday, December 22, 2024 4:19 PM
To: Neiman, Peter <Peter.Neiman@wilmerhale.com>; Dulberg, Andrew S. <Andrew.Dulberg@wilmerhale.com>; Warren, Brittany R. <Brittany.Warren@wilmerhale.com>; smccarthy@kostelanetz.com; Nicholas Bahnsen <nbahnsen@Kostelanetz.com>; Daniel Davidson <ddavidson@Kostelanetz.com>; Goldberg, David L. <david.goldberg@katten.com>; michael.rosenshaft@katten.com
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Subject: SKAT's allegations of plans as qualified plans under IRC 401(a)

EXTERNAL SENDER

All,

We write to inform you that SKAT has decided not to pursue the allegations in the relevant complaints for Trial One that the pension plans falsely stated that the plans were qualified plans under Section 401(a) of the Internal Revenue Code. We intend to inform the Court in writing tomorrow.

Regards,
Marc

Marc A. Weinstein | Partner
Chair, White Collar Defense

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